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USDC SDNY DOCUMENT ELECTRONICALLY FILED DOC #: DATE FILED: 11/2/15
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October 29, 2015

BY ECF

MEMORANDUM ENDORSED

The Honorable Gregory H. Woods
United States District Judge
Southern District of New York
United States Courthouse
500 Pearl Street
New York, New York 10007

Re: *United States v. Karen Alameddene,*
14 Cr. 808 (GHW)

Dear Judge Woods:

This letter is submitted on behalf of Karen Alameddene, defendant in the above-entitled case, and whom I represent by CJA appointment, and, for the reasons set forth below, respectfully requests an adjournment of Ms. Alameddene's sentencing, which is currently scheduled for November 12, 2015, at 4p.m. This is the third request for an adjournment of the sentencing. I have spoken with Assistant United States Attorney Stanley J. Okula, Jr., who has informed me that the government does not object to this request.

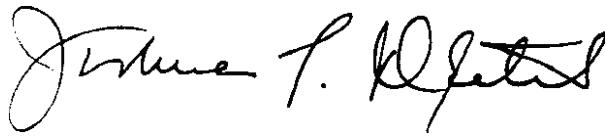
The adjournment is requested because of the time necessary to complete Ms. Alameddene's tax returns (a provision in her plea agreement), which has been quite time-consuming because Ms. Alameddene is in custody, and because my schedule has required me to be out of town on business for parts of the past four weeks (in Washington, D.C., and California). In addition, today I just completed – with counsel for three co-appellants – a joint Brief to be submitted in the Court of the Appeals for the Ninth Circuit in *United States v. Moalin*, which includes a complex issue of first impression: the only criminal prosecution in which the National Security Agency's bulk telephony metadata program was used to gather evidence (in the form of foreign intelligence wiretaps).

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Hon. Gregory H. Woods
United States District Judge
Southern District of New York
October 29, 2015
Page 2 of 2

As a result, it is respectfully requested that the sentencing be adjourned. After consultation with AUSA Okula, and due to other scheduled matters and travel commitments, it is requested that sentencing be re-scheduled for any time during the following days (during which both AUSA Okula and I are available), if amenable to the Court: December 9th, December 10th, December 14th, or December 16th.

Respectfully submitted,



Joshua L. Dratel

JLD/

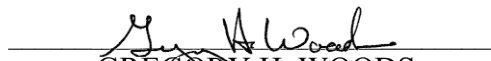
cc: Stanley J. Okula, Jr.
Assistant United States Attorney

Application granted in part. The sentencing scheduled for November 12, 2015 is adjourned to December 21, 2015 at 10:00 a.m. The defendant's sentencing submission is due December 7, 2015, and the Government's submission is due December 14, 2015.

SO ORDERED.

Dated: November 2, 2015

New York, New York



GREGORY H. WOODS
United States District Judge